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October 13, 2020

Ms. Luly Massaro, Clerk Rhode Island Division of Public Utilities and Carriers 89 Jefferson Boulevard Warwick, RI 02888

Re: The Pawtucket Water Supply Board - Docket 5022 In Re: Suspension Of Service Terminations And

Certain Collection Activities During The COVID-19 Emergency

Dear Ms. Massaro:

Enclosed herewith please find an original and nine copies of the Pawtucket Water Supply Board's Response to the Rhode Island Public Utilities Commission's Data Requests On The Quantification of Waived Fees.

Thank you for your attention to this matter.

Sincerely,

Joseph A. Keough, Jr.

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**Enclosures** 

cc: Service List via electronic mail

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION DOCKET 5022

Response of The Pawtucket Water Supply Board to the Rhode Island Public Utilities Commission's Data Reguests on the Quantification of Waived Fees

**Comm. 1**: Does Pawtucket Water Supply Board typically charge late fees to customers? If so, please provide the tariff reference and the types of customers to whom the late fee applies.

**Response:** No, the Pawtucket Water Supply Board (PWSB) does not charge late fees to its customers.

Prepared by: Robert Benson

**Comm. 2**: Does Pawtucket Water Supply Board typically charge interest on overdue balances to customers? If so, please provide the tariff reference and the types of customers to whom the interest charge applies.

**Response:** Yes, PWSB typically does charge interest on the overdue balances to its customers. See Docket No. 4550 Tariff Schedule G effective July 9, 2017.

**Prepared by:** Robert Benson

**Comm. 3**: Does Pawtucket Water Supply Board typically pass through to the user the so called "convenience fees" associated with paying with credit cards or debit cards?

**Response:** No, PWSB does not pass through to the customer the "convenience fees" associated with payments by credit cards or debit cards. See Order 20879 effective October 4, 2012 (Docket 3569) authorizing the Pawtucket Water Supply Board to absorb the cost of the "convenience fees."

**Prepared by:** Robert Benson

**Comm. 4**: Does Pawtucket Water Supply Board typically pass through to the user the so called "convenience fees" associated with paying with an ACH/electronic check?

**Response:** No, PWSB does not pass through to the customer the "convenience fees" associated with payments by an ACH/electronic check. See Order 20879 effective October 4, 2012 (Docket 3569) authorizing the Pawtucket Water Supply Board to absorb the cost of the "convenience fees."

Prepared by: Robert Benson

**Comm. 5**: Does Pawtucket Water Supply Board intend to seek recovery of the costs associated with the absorption of the applicable fees?

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION DOCKET 5022

Response of The Pawtucket Water Supply Board to the Rhode Island Public Utilities Commission's Data Reguests on the Quantification of Waived Fees

**Response:** No, PWSB does not intend to seek recovery of costs associated with the absorption of the applicable fees. These fees are authorized expenses already recovered within our current rate structure.

Prepared by: Robert Benson

**Comm. 6**: Please indicate the date upon which Pawtucket Water Supply Board ceased charging customers for late fees, interest fees, credit card/debit card payment fees, or ACH/check fees (please list each separately, even if the date is the same) as a result of the Commission's decision.

**Response:** Effective June 1, 2020, Pawtucket Water Supply Board ceased charging customers interest fees on overdue balances in accordance with the Commission's decision issued May 28, 2020.

**Prepared by:** Robert Benson

**Comm. 7**: Utilities only collect late fees and interest fees on accounts for which payments are made. Similarly, credit card/debit card fees and ACH/electronic check fees are only absorbed by the utility under the PUC's order if payments are made. For the period commencing on the date provided in response to number 5 through the most recent date available (9/), please provide the following:

(NBC should provide the amount after June 30; KCWA's credit card fees were addressed in its rate case, so the responses to those questions would be N/A and its interest fee waiver was through the end of the Commission's orders in this docket, which was July 17 for water utilities)

- a. The total number of accounts on which payments were made.
- b. The number of accounts where payments were made and interest and/or late fees were waived.
- c. The number of accounts where payments were made by credit card/debit card.
- d. The number of accounts where payments were made by ACH/electronic check.
- e. The dollar amount of credit card/debit card fees absorbed by the utility that would have otherwise been assessed to the customer paying with a credit card/debit card.
- f. The dollar amount of ACH/electronic check absorbed by the utility that would have otherwise been assessed to the customer paying through ACH/electronic check.
- g. The dollar amount of waived late fees on accounts where payments were made.
- h. The dollar amount of waived interest fees on accounts where payments were made.

**Response:** It should be noted that the PWSB's billing software does not allow us to calculate interest fees and then "waive" them. If interest fees were calculated, they would show on the

Response of The Pawtucket Water Supply Board to the Rhode Island Public Utilities Commission's Data Reguests on the Quantification of Waived Fees

bill. As such, the PWSB has not calculated interest fees on overdue balances beginning on June 1, 2020. Therefore, the amount of interest fees waived is unknown.

a. Our software does not track payments by the number of accounts making payments. The cash update report identifies the number of payments posted to the billing software. The number of payments received between June 1, 2020 and September 30, 2020 have totaled 75,778. These payments breakout as follows:

| i.   | June      | 19,592 |
|------|-----------|--------|
| ii.  | July      | 19,118 |
| iii. | August    | 18,707 |
| iv.  | September | 19,361 |

- b. Unknown.
- c. PWSB uses a third party servicer for credit/debit card and ACH payments from our website or by toll-free telephone (IVR). The merchant bank does not separately identify the credit card/debit card payments from the ACH payments. Lockbox payments are checks sent by mail to our P.O. Box and on-line bill payments sent to our bank electronically. The number of payments between June 1, 2020 and September 30, 2020 by month are as follows:

|               | CC/DC & ACH | Lockbox | In person |
|---------------|-------------|---------|-----------|
|               |             |         |           |
| i. June       | 7,683       | 11,823  | 86        |
| ii. July      | 7,719       | 11,084  | 315       |
| iii. August   | 7,727       | 9,648   | 332       |
| iv. September | 7,980       | 11,003  | 378       |

- d. See the response to item c. above
- e. Please see the PWSB's response to Comm. 4.
- f. N/A
- g. N/A
- h. As set forth above, the PWSB does not have this information.

**Prepared by:** Robert Benson

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Response of The Pawtucket Water Supply Board to the Rhode Island Public Utilities Commission's Data Reguests on the Quantification of Waived Fees

**Comm. 8:** Please indicate the first date Pawtucket Water Supply Board sent termination notices to customers with dates not affected by a Commission decision (in other words, the utility could follow through with a physical termination on or after the notice period if payment or a payment arrangement was not made). Please break out by customer class if applicable.

**Response:** PWSB began issuing termination notices on July 21, 2020 to custmers where we could follow through with a physical termination. These termination notices are requesting these customers to contact us and make payment arrangements or agree to an affordable payment plan. We have not physically terminated any services as of 9/23/2020. The mailing of our termination notices are based upon our geographic billing cycles and we are not able to break out these notices by customer class. As of 9/23/2020 we have mailed out termination notices to 843 accounts.

Prepared by: Robert Benson